

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

Blockquarry Corp. f/k/a ISW Holdings, Inc.,

Plaintiff,

v.

Litchain Corp. and Gaffney Board of Public
Works,

Defendants.

Gaffney Board of Public Works,

Defendant/Counter and Cross-
Claimant,

v.

Blockquarry Corp. f/k/a ISW Holdings, Inc.,

Counterclaim Defendant,

and

Litchain Corp.,

Crossclaim Defendant.

C/A No. 7:23-cv-01427-TMC

**PROPOSED
CROSSCLAIM DEFENDANT
CRYPTO INFINITI LLC'S
FED. R. CIV. P. 24(a)(2)
AMENDED MOTION TO
INTERVENE**

Crypto Infiniti LLC (“CI”) hereby amends the relief sought in its FED. R. CIV. P. 24(a)(2) motion to intervene (the “Motion”). (ECF No. 94). The amended relief requested is to either: (i) intervene as a defendant to the declaratory judgment claim at Count I of Blockquarry Corp. f/k/a ISW Holdings, Inc.’s (“Blockquarry”) Complaint. (ECF No. 1, at 14-15), or (ii) intervene in the action to allege a declaratory judgment claim against Blockquarry and Gaffney Board of Public Works (“Gaffney”) to establish ownership of the equipment that CI identified in the Motion and

to require Blockquarry and Gaffney to return the same to CI, and for any further relief the Court deems appropriate.

The basis for the amended relief request is that after CI filed the Motion on March 6, 2024, Gaffney subsequently sought to dismiss both claims that CI sought to intervene in. (ECF Nos. 121, 95). Specifically, Gaffney dismissed the interpleader claim on March 12, 2024. (ECF No. 95). On April 9, 2024, Gaffney purported to dismiss certain parts of its declaratory judgment claim that related to the bitcoin mining equipment. (ECF No. 121). Accordingly, CI amends the Motion to seek the requested relief identified above.

Pursuant to LOCAL CIV. RULE 7.02, the undersigned conferred with counsel for Gaffney and it does not consent to the amendment, conferred with counsel for Blockquarry and it does not consent to the amendment, conferred with counsel for Proposed Intervenor Bitmain Technologies Georgia Limited and it does not oppose the amendment, and has not attempted to confer with Litchain Corp. because that party has not appeared in the case.

Respectfully submitted,

April 10, 2024

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/s Burl F. Williams

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